



U.S. Department of Justice

United States Attorney
Southern District of New York

The Silvio J. Mollo Building
One Saint Andrew's Plaza
New York, New York 10007

December 1, 2021

[REDACTED]

The Honorable Paul A. Engelmayer
United States District Judge
Southern District of New York
United States Courthouse
40 Foley Square
New York, New York 10007

Re: *United States v. James Bradley and Arwa Muthana*, 21 Cr. 277 (PAE)

Dear Judge Engelmayer:

(U) The Government respectfully submits this classified, *ex parte* letter in response to the Court's order at the November 5, 2021 status conference requiring the Government to submit a letter outlining its plan for the handling of classified materials and any briefing pursuant to Section 4 of the Classified Information Procedures Act ("CIPA"). The Government proposes, with the consent of the defense, submitting its Section 4 CIPA motion to the Court on or before April 1, 2022. Given that the Court has scheduled a status conference for February 7, 2022, at which time the Court has advised that it expects the defendants to identify any motions they may make, and that the Court intends to set a motion and trial schedule, the Government respectfully submits that the proposed deadline of April 1, 2022 for its Section 4 motion will not delay the progress of this case. While this classified letter addressing the Government's anticipated CIPA Section 4 motion is properly submitted *ex parte* and under seal for the reasons discussed below, the Government intends to file a notice of this submission on the public docket that provides the unclassified information set forth in this paragraph.

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